COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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APPLICATION OF COLUMBIA GAS OF KENTUCKY,)
INC. FOR A LIMITED DEVIATION FROM THE) CASE NO.
REQUIREMENTS OF 807 KAR 5:022, SECTION) 2015-00084
14(22)(A))

ORDER

On March 12, 2015, Columbia Gas of Kentucky, Inc. ("Columbia Gas") filed a request for a deviation from 807 KAR 5:022, Section 14(22)(a), which requires, among other things, that each gas utility keep in continual use an accurate recording pressure gauge on its distribution systems. Commission Staff's Initial Request for Information to Columbia Gas ("Staff's Initial Request") was filed on June 12, 2015. Columbia Gas responded to Staff's Initial Request on June 26, 2015. Staff's Second Request for Information to Columbia Gas ("Staff's Second Request") was filed on September 18, 2015. Columbia Gas responded to Staff's Second Request on October 2, 2015. Staff's Third Request for Information to Columbia Gas ("Staff's Third Request") was filed on November 17, 2015. Columbia Gas responded to Staff's Third Reguest on December 1, 2015. On February 18, 2016, an informal conference was held. On May 6, 2016, Columbia Gas filed additional supporting information in response to issues raised at the informal conference. On July 26, 2016, Columbia Gas filed a statement recommending that this case be submitted for adjudication without a hearing, based on the record developed in this case. No person has sought intervention in this proceeding. By this Order, we approve Columbia Gas's requested deviation.

Columbia Gas is seeking a limited deviation from the requirements of 807 KAR 5:022, Section 14(22)(a), the Commission's regulation prescribing where recording pressure gauges must be located and how they should function on a natural gas utility's distribution system. 807 KAR 5:022, Section 14(22)(a), specifically states that

[e]ach utility shall keep in continual use one (1) or more accurate recording pressure gauges on its distribution systems. These gauges shall be located at such points and in such manner sufficient to reflect a continuous record of gas pressure and character of service being furnished throughout the entire system.

Columbia Gas states that, "after reviewing this rule in depth, Columbia Gas interprets the Commission rule to require a recording pressure gauge downstream of *every distinct pressure system.*" Columbia Gas's current infrastructure includes 314² distinct pressure systems, or distribution systems, which are controlled by 548 district regulator stations. In order to comply with 807 KAR 5:022, Section 14(22)(a), Columbia Gas would be required to add recording pressure gauges on approximately 159 of its distribution systems that are supplied by a single district pressure regulating station. The specific distribution systems ("Systems") for which Columbia Gas is requesting a limited deviation from the requirements of 807 KAR 5:022, Section

¹ Memorandum of February 18, 2016 Informal Conference from Virginia W. Gregg, Staff Attorney, to Case File (filed Mar. 17, 2016). Columbia Gas was made aware that some of its distribution systems were not in compliance with 807 KAR 5:022, Section 14(22)(a) as the result of an internal system audit in 2006. Columbia Gas's Application is to resolve this internal discovery of non-compliance.

Columbia Gas of Kentucky, Inc.'s Response to Staff's Initial Request, Item 2, amended this number from 312 to 314.

³ Id., Item 1.

⁴ Id., Item 3.a.

⁵ Id., Item 3.b.

⁶ Id., Item 5.

14(22)(a), are identified in the Appendix to this Order.⁷ These Systems lack uniformity and vary in the number of customers served, the length and size of pipelines utilized, the maximum allowable operating pressure ("MAOP"), and the normal operating pressure.⁸

Columbia Gas states that all of its distribution systems, including the Systems that are the subject of Columbia Gas's application, are in compliance with 49 CFR 192.741, which is the federal regulation that also addresses when telemetering or recording pressure gauges are required on distribution systems. Specifically, 49 CFR 192.741 states that:

- (a) Each distribution system supplied by *more than one* district pressure regulating station must be equipped with telemetering or recording pressure gauges to indicate the gas pressure in the district (emphasis added).
- (b) On distribution systems supplied by a *single* district pressure regulating station, the operator shall determine the necessity of installing telemetering or recording gauges in the district, taking into consideration the number of customers supplied, the operating pressures, the capacity of the installation, and other operating conditions.
- (c) If there are indications of abnormally high or low pressure, the regulator and the auxiliary equipment must be inspected and the necessary measures employed to correct any unsatisfactory operating conditions.

⁷ Response to the Commission Staff's Informal Conference Data Requests, Item 2 (filed May 6, 2016).

Response to Staff's Initial Request, Item 5, states in part that: (1) Station Number 1094 has 2,346 customers, 127,658 feet of 2-inch, 3-inch, 4-inch, 6-inch and 8-inch pipe, an MAOP of 40 and normal operating pressure of 32 psig; (2) Station Number 803523 has no customers, 21,550 feet of 2-inch, 3-inch and 6-inch pipe, an MAOP of 75 and normal operating pressure of 44 psig; (3) Station Number 1151 has two customers and 15 feet of 4-inch pipe, an MAOP of 100 and normal operating pressure of 95 psig; and, (4) Station Number 1375 has 19 customers, 52,155 feet of 2-inch, 10-inch, 12-inch, and 16-inch of pipe, an MAOP of 60 and normal operating pressure of 30 psig.

Columbia Gas is seeking a limited deviation from 807 KAR 5:022, Section 14(22)(a), which requires that a utility keep in continual use recording pressure gauges on every distribution system, while 49 CFR 192.741(a), as noted above, mandates telemetering or recording pressure gauges only on distribution systems supplied by "more than one" district pressure regulating station.⁹

Further, in compliance with the requirements of 49 CFR 192.741(b), in determining where to install a recording pressure gauge on its distribution systems supplied by a single district pressure regulating station, Columbia Gas considers several factors, including: the pressure differential across the district station; the number of valves in the by-pass; the capacity of the station; the presence of internal relief on the regulators; and, the presence of customers having large volume measurement equipment on the system. In addition, Columbia Gas states that when an abnormal operating condition is encountered at a pressure control station, it initiates an investigation, conducts an inspection, and takes corrective action in accordance with 49 CFR 192.741(c).

In support of its application, Columbia Gas states that it is able to predict the functional capability of its pressure regulating stations through its design and construction methodology. This methodology includes Columbia Gas's installation of

⁹ 49 CFR 192.741(a), the Pipeline and Hazardous Materials Safety Administration's regulation at hand, requires that "[e]ach distribution system supplied by more than one district pressure regulating station must be equipped with telemetering or recording pressure gauges to indicate the gas pressure in the district."

¹⁰ Response to Staff's Initial Request, Item 9.

¹¹ Id.

Memorandum of February 18, 2016 Informal Conference from Virginia W. Gregg, Staff Attorney, to Case File (filed Mar. 17, 2016) at 1.

auxiliary relief valves, along with control and monitor regulators, on its single supply distribution systems serving less than 100 customers, which Columbia Gas considers vulnerable to over-pressurization. Columbia Gas states that its single supply distribution systems serving more than 100 customers are able to absorb minor over pressurization caused by pressure leak-through at the regulating station, and Columbia Gas does not install auxiliary relief valves on these systems. ¹³

Columbia Gas maintains that it currently provides its customers with safe and reliable gas service and that its technicians conduct annual regulator station inspections, along with inspections during peak operations, as part of its winter-operations planning. This planning includes inspections of approximately 90 percent of its regulator stations, conducted on the first day that the temperature drops below 20 degrees, the first day that the temperature drops below 15 degrees, the first day that the temperature drops below 10 degrees and each day that the temperature drops below 5 degrees.¹⁴

Columbia Gas checks for abnormal pressure events during its annual regulator inspections, its winter operations cold weather checks, during a Gas Measurement Billing audit trail, or when a Columbia Gas Service Tech is investigating an abnormal operating condition on a customer's property, 15 if these abnormal pressure events occur

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¹³ Id.

¹⁴ Id. at 2.

¹⁵ Response to Staff's Informal Conference Requests for Information, Item 9 (filed May 6, 2016).

at the time of inspection.¹⁶ Columbia Gas maintains that its inspections during peak operating periods actively protect its vulnerable systems from over pressurization, while compliance with 807 KAR 5:022, Section 14(22)(a) passively collects data which is only reviewed at a later time.¹⁷

In support of its application, Columbia Gas refers to the Commission's prior decision in Case No. 2004-00275, in which we granted Atmos Energy Corporation ("Atmos") a limited deviation from 807 KAR 5:022, Section 14(22)(a), for 59 of its regulator stations. Columbia Gas argues that, as existed in the Atmos case, the extra cost to install and maintain the additional recording pressure gauges would be an unwarranted expense. Columbia Gas estimates that its full compliance with 807 KAR 5:022, Section 14(22)(a), would cost \$420,000 for the initial installation of additional recording pressure gauges. In addition, Columbia Gas would incur an annual cost of \$36,000 to monthly monitor and manually change the recording device charts for these new recording pressure gauges.

Memorandum of February 18, 2016 Informal Conference from Virginia W. Gregg, Staff Attorney, to Case File (filed Mar. 17, 2016) at 2. Columbia Gas often learns of abnormal pressure events as the result of complaints by customers. A low-pressure event may be reported by customers who experience a service outage. In addition, district regulator stations designed for fewer than 100 customers have over-pressure protection provided by auxiliary relief valves. Columbia Gas may become aware of high-pressure events when customers in the vicinity experience and report the odor or noise resulting from gas escaping through these relief valves as they trip and blow off excess gas.

¹⁷ Id.

Application of Atmos Energy Corporation for a Limited Deviation from the Requirements of 807 KAR 5:022, Section 4(23)(b)(1)-(4) and 807 KAR 5:022, Section 14(22)(a) (Ky. PSC Jan. 20, 2005).

¹⁹ Id

²⁰ Application at 2.

²¹ Application at 3.

The Commission having considered the evidence of record and being otherwise sufficiently advised, finds:

- 1. Columbia Gas has requested a limited deviation from Administrative Regulation 807 KAR 5:022, Section 14(22)(a), which requires that "each utility shall keep in continual use one or more accurate recording pressure gauges on its distribution systems," for the Systems identified by Columbia Gas in the Appendix to this Order.
- 2. The additional cost of installing, maintaining, and monitoring of recording pressure gauges on the Systems identified by Columbia Gas in the Appendix to this Order will not substantially contribute to the safety of Columbia Gas's distribution system or improve the quality of service for its customers.
- 3. The Commission has previously granted a limited deviation from Administrative Regulation 807 KAR 5:022, Section 14(22)(a), as requested by Columbia Gas herein, to Atmos Energy Corporation in Case No. 2004-00275.²²
- The requested deviation from Administrative Regulation 807 KAR 5:022,
 Section 14(22)(a), for the Systems identified in the Appendix to this Order, will not

²² Case No. 2004-00275, Application of Atmos Energy Corporation for a Limited Deviation from the Requirements of 807 KAR 5:022, Section 14(23)(b)(1)–(4) and) 807 KAR 5:022, Section 14(22)(a) (Ky. PSC Jan. 20, 2005).

reduce the quality of service provided by Columbia Gas to its customers or result in an unsafe practice or endanger the public.²³

5. Good cause exists to permit Columbia Gas to deviate from the requirements of Administrative Regulation 807 KAR 5:022, Section 14(22)(a), for the Systems identified by Columbia Gas in the Appendix to this Order and Columbia's request should be granted.

IT IS THEREFORE ORDERED that Columbia Gas's request for a limited deviation from the requirements of 807 KAR 5:022, Section 14(22)(a), for the Systems identified by Columbia Gas in the Appendix to this Order is granted.

By the Commission

ENTERED

DEC 0 1 2016

KENTUCKY PUBLIC SERVICE COMMISSION

ATTEST:

Executive Director

Columbia Gas affirms that its current system complies with federal regulation 92 CFR 192.741(a) and is designed to operate safely. Columbia Gas maintains that being required to install, maintain, and monitor the recording pressures gauges on the Systems identified by Columbia Gas in the Appendix to this Order would provide only a passive record of gas pressure and character of service. Currently, in determining where to install a recording pressure gauge, Columbia Gas states that it considers the pressure differential across the district station, the number of valves in the by-pass, the capacity of the station, the presence of internal relief on the regulators, and the presence of customers who have large-volume measurement equipment on the system.

APPENDIX

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2015-00084 DATED DEC 0 1 2016

KY PSC Case No. 2015-00084 Staff's Informal Conference Request No. 2 Respondent: Gary Sullivan

COLUMBIA GAS OF KENTUCKY, INC. RESPONSE TO STAFF'S INFORMAL CONFERENCE REQUESTS FOR INFORMATION DATED MARCH 17, 2016

2. Provide an update of the spreadsheet that was attached to Columbia's response to Commission Staff's Initial Request for Information ("Staff's Initial Request"), Item 5. This update should indicate which customers it considers to be high volume customers.

Response:

The updated spreadsheet is attached and a column has been added to include the measuring station numbers of our large volume customers.

Normal Pipe Station System Number Length Pipe Size Operating Number (in) System Name MAOP Pressure Premise ID Station Location Large Volume Customer Number Customers (ft) 1018 32010191 103 20,018 LP | 10.5" w.c. | 0200120 32010193 217 14,488 2,3,4,5,8 LP 10.5" w.c. 0200137 1026 804625, 848642 40 |35 psig 0200125 10,170 2,3,4,6 1027 32010134 148 45_ 60 47 psig 0200095 805147 1029 32010130 6,120 2.3.4 1031 32010194 397 19,251 3,4,6,8,10,12 LP 10.5" W.C. 0200139 60 50 psig 0200469 32010096 139 16,787 2,3,4,6 1052 202 8 7 psig 0200084 1061 10,579 2,3,4,6 32010040 60 0200084 845244 26 11,780 2,3,4,6 42 psig 32010028 1061 804726, 804422, 849006 35 0200109 29,445 30 psig 1066 32010133 279 2,3,4,6 0200062 1067 32010099 164 19,292 2,3,4 8 7 psig 804217, 803739, 805709, 848988 32010122 15 4,989 40 | 25 psig 0200107 2,4,6 1068 35 30 psig 0200086 32010135 45 1072 7,429 2,4,6 40 32 psig 0209577 32010101 2346 127,658 2,3,4,6,8 1094 0200071 9 1097 51 7,508 2,4,6 6 psig 32010086 14 10 psig 0200129 1100 32010038 337 39,932 2,3,4,6 0200478 8 7 pslg 1112 32010091 34 2,3,4,6,8 5,466 22,644 10 8 psig 0200360 1113 131 2,3,4,6 32010108 8 5 pslg 0200362 1115 32010107 44 14,070 2,3 10 8 psig 0200074 1118 32010109 14 3,144 10 8 psig 0200073 32010127 16,151 2,3,4,6,8 1119 214 0200467 7 5.5 psig 1122 32010085 42 5,590 2,3,4 0200369 8 6 psig 1129 32010042 2,523 2,3 20 | 17 psig 0200078 42,344 1135 32046001 118 2,3,4 14 |8 psig 0200374 1135 32010079 4,457 2,3,4 814058 0200378 60 35 psig 1142 32010092 161 13,032 2,3,4 60 25 psig 0200380 1145 32010034 27 15,306 2,3,4 0200381 60 11 psig 1145 32057001 9 1,375 2 0200382 1147 32010076 9 669 2 60 8.5 psig 0200384 60 32010037 272 18,883 20 pslg 1149 0200470 814454 100 95 psig 32010185 2 15 1151 8 6 psig 0200387 32010083 72 16,335 1154 10 8 psig 0200390 1157 32010115 3,107 2,3 LP 10" w.c. 0200392 1159 32010093 31 996 10 9 psig 0200395 32010140 5000 (apro unk 1163 0200396 2,3,4 LP 10.5" w.c. 1164 32010104 32 5,691 LP 10" w.c. 0200397 1165 32010103 17 705 4 0200458 2,3 10 7.5 psig 21 4,491 1170 32010117 5 psig 0200868 2,3,4 6 12 3,455 1171 32010095 LP 10" w.c. 0200459 1172 32010189 12 2,757 4.6 LP 10.5" W.C. 0200460 1173 32010074 4 4,972 2,3,4,6,8 60 0200476 19,445 30 psig 1176 32010126 142 2,3,4 21,441 60 30 psig 0200879 2,3,4,5 1177 32010128 331 0200874 9 8 psig 8,652 2,3 1180 32010053 54 60 10 psig 0200477 1181 32010119 14 2,610 2,3 0200876 60 40 psig 1182 32010139 817 2,3 0200889 .60 10 psig 32010136 7 2,190 1183 0206235 12,748 2,3,4 10 6 psig 32047001 50 1185 0206232 10 8 psig 2,3 1187 32010113 23 9,542 0200972 15 | 11 psig 1195 32068001 3,771 1,2 0206520 20 15 psig 32010098 5,998 2,3,4 1199 26 0208722 60 30 psig 1203 32010144 30 10,499 2,4 60 | 22 psig 0208552 32010080 4,407 2,3,4 1204 36 60 | 50 pslg 0210214 1209 32010090 90 27,490 2,3,4,6,10

			Pipe			1	Normal	T	1	Pa
Station	System	Number	Length	Pipe Size			Operating			
Number	Number	Customers	(ft)	(in)	System Name	MAGE	Pressure	Premise ID	Station Location	Large Volume Customers
1210	32010082	5	1,058	2		60	15 psig	0210286		
1211	32010123	1 -	384	8		60	40 psig	0210709		846769
1215	32010051	1334	84,930	2,3,4,6		60	48 psig	0211762		805529, 845927
1217	32010192	6	1,800	2	-	15	10 psig	0212245		
1230	32010165	89	5,406	2,3,4		5	4 psig	0200191	-	
1230	32010166	122	11,417	2,3,4,6,8		LP	10" w.c.	0200191	-	
1237	32050001	6	2,410	2 2		10	7 psig	0200952	•	
1240	32010180	9	2,754	2		60	40 psig	0209287	⁻ å	
1251	32010176	926	93,386	1.25,2,2.5,3,4,6		20	17.5 psig	0200293	-	805295
1273	32047003	67	8,865			5	4 psig	0200310	-	
1275	32010188	- 6	28,747	2,4,6		99	73 psig	0200405	1	849278
-			12,415	2,4		10	7 psig	0200335	· [
1277	32010172 32010174	95	5,873	1.25,2		10	7 psig	0200721		
	32010174	<u>58</u>	6,905		120	10	7 psig	0201008	-	
1279	and the second of	- 33 -		1.25,1.5,2,2.5		60	28 psig	0201007	-	
_1280	32010179	50	5,257	2,6		60	25 psig	0200921	-	
1282	32064001	Person .	5,216		1	60	50 psig	0211320	-	
1285	32010182	- 10	8,003	2,4,6		60	12 pslg	0200015	-	
_1352	32051029	1	500 (aprox)	unk		10	5 psig	0200409	-	
1355	32033001	5 -	3,614	1.25,2		10	5 psig	0200410	•	
_ 1367	32023001	- 19	3,375	2,10,12,15		60	30 psig	0209741	-	
1375	32051008	19	52,155	2,10,12,15		60	25 psig	0209818		
1377	32051021		10,436	Statement of the last of the l		60	40 psig	0210406	-	
1379	32051025	15	2,940	- 2,4	100	10	7.5 psig	0200811	- 1	
1405	32005003			2,3,4	7 77	16	7.5 psig	0200411	-	
1406_	32006001	- ⁴ -	525 4,677	- 2		60	10 pslg	0200207		
_1413	32039001			2,3,4,6,8	ž	42	30 psig	0200229		
1425	32012003	142	34,303	2,3,4		10	8 psig	0200421	* 1	
1430	32034001	1	841			60		0200792	- 🖟	805682
1434	32054001	27	25,352	2,3		10	25 psig	0200892	-	
1435	32053001	- 11	803	2		60	6 psig	0210154	-	
1439	32066002	9 -	440			10	8 psig	0210363		
1440	32017001	34	5,063	2,3,4		10	7 psig	0210362	-	
1441	32029001	55	8,070	2,3		10	7 psig	0210230	-	
_1442	32056001	43	6,476	2,3,4		8	6 psig	0200425	1	
_ 1462	32048007	_ 5	3,536	2,4		60	3 psig	0210247	-	
1488	32065001	. 7	3,718_			15	12 psig	0200272	- 1	
1523	32010067	88	5,423	2,4,8		14	12 psig	0200143		
1526	32010058_	303	33,350	2,3,4,6		20	14.5 psig	0200163		
1529	32010064	35	8,353	2,3,6		20	15 psig	0200144	-	
1533	32010072	152	23,415	2,3,4,6		12	7 psig	0200145	-	
1536	32010068	115	14,173	2,4		58	45 psig	0200445	-	804946, 844119, 845229, 848431
1538	32010071	64	19,403	2,3,4,6		24	18 psig	0200621	-	001310,011323,01013
1539	32010069	19	5,798	2,3	į.	60		0201005	- /	
1542	32010161	2	1,608	2	<u> </u>	-	40 psig	0201012	- {	848556
_1543 _	32010070	_ 110	35,356	2,3,4,6	a. T. S. S.	60	50 psig	0201012	- (
1544	32010055	3	1000 (aprox	unk		15_	10.5 psig			
_1545	32010153	. 233	11,449	2,3 - —		60	18 psig	0206664		
1547	32010063_	33	2,681	- 2		10	8 psig	0200238		
1556	32010046	776	62,642	2,3,4		10	8 psig	And the second second	-	
1564	32010154	784	51,235	2,4,6		30	25 pslg	0200654		
1565	32010155	5	3,904	2,3,4		60	50 psig	0206610	-	
1568	32010156	495	50,302	2,4		60	30 psig	0200963	-	
1569	32010154	19	7,285	2,3,4		60	30 psig	0206597		

Respondent: Gary E. Sullivan

Station lumber	System Number	Number Customers	Pipe Length (ft)	Pipe Size	System Name		Normal Operating Pressure		Station Location	Large Volume Customers
1570	32010159	23	14,872	2,4,6			40 psig	0206598		
1585	32010005	80	7,272	2,3,4			4.5 psig	0200247		805913
1586	32010007	107	7,518	2,3,4,6,8	2.4	7	6 psig	0200241		
1587	32010009	179	11,444	2,3,4,6			5 pslg	0200242	7 ×	
1590	32010006	8	1,023	3	<u>.</u>		8 pslg	0200877		
1591	32010152	34	3,211	. 2	.[60	10 psig	0200724		
1594	3201014B	14	4,269	2		_60_	10 psig	0206606	A-1	
1595	32010147	. 88	11,599	2,3			10 psig_	0206607		
597	32010162	6	3,209	2	E		25 psig	0206608		
599_	_ 32010163_	237	11,392	- 2,3	F-8		25 psig	0208608	1.0	
617	32010021	_ 32	10,595	2,4			10 psig	0200454	1.00	
633	32010025	27	9,561	2			12 psig	0200740		
635	32010039	32	10,302	2	3,50		12 psig	0206557		
636	32010022	47	10,595	2,4			6 psig	0208335		814673, 844014, 845843, 847691, 8486
638	32055001	92	36,866	2, 3, 4, 6			50 psig	0210841		804667
640	32010017_	248	25,800	2, 3, 4, 6		annual met ter	5 psig	0200689		
564	32049003	94	15,096	2, 3, 4, 6	F. Company		15 psig 12 psig	0200691		
.669	32049004	9	2,310	2	N.		23 psig	0200956		
670	32049005	151	24,223	2.4			5 psig	0200888		
671	32049009	2-	400	- 2	i i		5 psig	0206403		
672	32049002 32049001	- 48	7,016	2,3	1		12 psig	0208560		
673	32049001	87	18,013 338	2 2			10 psig	0208564	(C)	
674	32001013	3 -	595	- 4			11 psig	0200706		
1684 1687	32001015	24	2,347				5 pslg	0200705		
1688	32001006	125	20,218	2,4 -			12 psig	0200708	41	
1690	32001021	81	25,816	- 2	1		30 psig	0200709		
1691	32001017	17	1,736	2 -		-	8 psig	0200710		
1692	32001008	54	6,109	2, 3, 4			12 psig	0200219		
693	32001024	18	2,147	4			10" w.c.	0200711		
694	32001019	4	275	. 2		10	6 pslg	0206455		
695	32001007	2	3,588	2,3,4			10" w.c.	0200900		
696	32001005	5	1,224	2,3		60	35 psig	0209721		
851	32010059	289	25,583	2,4,6		60	20 psig	0208498		
853	32010150	13	1,474	3		6D	18 psig	0209339		
855	32010183	4	2,357	2 _			12 psig	0210886	100	
857	32010184	4	765	2			14 psig	0210907		
858	32010186	453	27,120	1, 2, 3, 4, 6, 8		the same of the same of the same of	45 psig_	0211194		
859	32010045	26	7,518	2, 3, 4	ă.		3 psig _	0211292		
7715	32007001	5	1,045	2	i		7.5 psig_	0212035		
		6	4,500	unk			15 psig	0212247		
5544	32019001	163	43,042	1, 2, 3	Į.		25 psig	0212045		
7712	32044001	122	13,210	2, 3, 4			7.5 psig	0212036		
7714	32041001	20	9,492	1, 2, 4			6 psig	0212024		
7716	32040001	42_	4,571	_ 2,4			5.5 psig	0212031		814480
7717	32011001	38	14,053	2, 3, 4		50	35 psig	0212032	188	2,4400
7718	_ 32043001_	77	10,764	2,3,4		9	B psig	0212035	l lu	
7719	32045001	39	5,289	2,3	* * * * * * * * * * * * * * * * * * *	- 10_	9 psig	0212048	1.30	
7720	32042001	- 90 75	9,492	1,2,4	.e.	50	8.5 psig	0212039		
7721	32038001	75	27,466	1, 2, 3, 4	J	60 10	35 pslg	0212046	U	

*Columbia Gas of Kentucky, Inc. 290 W Nationwide Blvd Columbus, OH 43215

*Honorable Stephen B Seiple Attorney at Law Columbia Gas of Kentucky, Inc. 290 W. Nationwide Blvd. Columbus, OHIO 43215